

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

IN RE)	Chapter 7
)	
LAURA O'CONNOR,)	Case No. 20-20638
)	
Debtor.)	Hon. Carol A. Doyle

NOTICE OF MOTION

TO: Attached Service List

PLEASE TAKE NOTICE THAT on March 11, 2021, at 10:00 a.m., I shall appear before the Honorable Judge Carol A. Doyle, or any other judge sitting in her stead and request a hearing on the Chapter 7 Trustee's Application to Employ Attorneys, a copy of which is attached hereto and thereby served upon you.

This motion will be presented and heard electronically using Zoom for Government. No personal appearance in court is necessary or permitted. To appear and be heard on the motion, you must do the following:

To appear by video, use this link: <http://www.zoomgov.com/>. Then enter the meeting ID.

To appear by telephone, call (669) 254-5252 or (646) 828-7666. Appearing by telephone will require extra clearance before being allowed into the hearing.

Meeting ID and password. The meeting ID for this hearing is 161 155 8289 and the password is Doyle742. The meeting ID and password can also be found on the judge's page on the court's website.

If you object to this motion and want it called on the presentment date above, you must file a Notice of Objection no later than two (2) business days before that date. If a Notice of Objection is timely filed, these motions will be called on the presentment date. If no Notice of Objection is timely filed, the Court may grant the motions in advance without a hearing

CERTIFICATE OF SERVICE

I, the undersigned, an attorney, hereby state that pursuant to Section II, B, 4 of the Administrative Procedures for the Case Management/Electronic Case Filing System, I caused a copy of the foregoing NOTICE OF MOTION and MOTION to be served on all persons set forth on the attached Service List identified as Registrants through the Court's Electronic Notice for Registrants and, as to all other persons on the attached Service List by mailing a copy of same in an envelope properly addressed and with postage fully prepaid and by depositing same in the U.S. Mail, Chicago, Illinois, on the 4th day of March, 2021.

s/ Gregory K. Stern

Gregory K. Stern

Gregory K. Stern (Atty. ID #6183380)
Monica C. O'Brien (Atty. ID # 6216626)
Dennis E. Quaid (Atty. ID #02267012)
Rachel S. Sandler (Atty. ID #6310248)
53 West Jackson Boulevard, Suite 1442
Chicago, Illinois 60604
(312) 427-1558

SERVICE LIST

Registrants Served Through The Court's Electronic Notice For Registrants

Patrick S. Layng
Office of the U.S. Trustee, Region 11
219 South Dearborn Street, Room 873
Chicago, Illinois 60604

N. Neville Reid
Fox, Swibel, Levin & Carroll, LLP
200 West Madison Street
Suite 3000
Chicago, Illinois 60606

Thomas R. Hitchcock
Hitchcock & Associates, P.C.
53 West Jackson Boulevard, Suite 724
Chicago, Illinois 60604

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APPLICATION TO EMPLOY ATTORNEYS

Now comes N. Neville Reid, Chapter 7 Trustee (the "Trustee"), and in support of his Application to Employ Attorneys, Gregory K. Stern, Monica C. O'Brien and Rachel S. Sandler (the "Attorneys"), respectfully states as follows:

1. On November 24, 2020, Laura O'Connor (the "Debtor") caused a Voluntary Petition for relief under Chapter 7 of the United States Bankruptcy Code to be filed; and N. Neville Reid (the "Trustee") was appointed as trustee in this case.

2. The Trustee believes that there are assets, including but not limited to the Debtor's interest in a divorce settlement.

3. Pursuant to 11 U.S.C. § 327(a) the Trustee desires to employ Gregory K. Stern, Monica C. O'Brien and Rachel S. Sandler because they have experience in matters of this nature and are well qualified to represent the Trustee in this case.

4. The professional services to be rendered by the Attorneys include, but are not limited to:

- (a) Assisting the Trustee in administering and liquidating assets;
- (b) Providing the Trustee legal advice with respect to his investigation, administration and liquidation of property of the estate;
- (c) Reviewing and examining the Debtor's assets, books and records; proofs of claim,

and any other documentation related to assets or property of this estate;

(d) Analyzing case for filing of complaints to recover assets on behalf of the estate with regards to any avoidance actions, fraudulent conveyances, or turnover of estate assets;

(e) Negotiating with creditors and other parties in interest, attending court hearings and meeting with attorney and other parties in interest;

(f) Preparation of applications to employ attorneys, accountants or other professional persons, including asset recovery specialists, objections to claims, and any other necessary pleadings required for the proper administration of this estate;

(g) Representation of Trustee at court hearings; and,

(h) Performing all other legal services that may be necessary or required for the representation of the Chapter 7 Trustee and for the proper administration of this estate.

5. The Attorneys have agreed to be compensated for services rendered in accordance with their hourly rates as in effect from time to time, with all compensation and reimbursement of costs being subject to further approval of this Court. At present, the hourly rates are as follows: \$500.00 for services rendered by Gregory K. Stern, \$475.00 for services rendered by Monica C. O'Brien, and \$350.00 for services rendered by Rachel S. Sandler.

6. The Attorneys have no connection with the Debtor, her creditors, or any other party in interest herein, their respective attorneys and accountants, the United States Trustee or any other person employed in the office of the United States Trustee, and the Attorneys represent no interest adverse to the Debtor or to the estate in the matters upon which they are to be engaged for the Trustee. The affidavits of Gregory K. Stern, Monica C. O'Brien and Rachel S. Sandler attesting to the foregoing are attached hereto and are made a part hereof.

7. The employment of Attorneys is in the best interest of this estate.

WHEREFORE, the Trustee prays for an Order, pursuant to 11 U.S.C. § 327(a), authorizing the employment of Gregory K. Stern, Monica C. O'Brien, and Rachel S. Sandler as attorneys for the Trustee herein, effective March 3, 2021, to perform all necessary legal services on behalf of the Trustee during this Chapter 7 proceeding; and, for such other further relief as this Court deems just.

/s/ Gregory K. Stern
Attorney For Chapter 7 Trustee

Gregory K. Stern (Atty. ID #6183380)
Monica C. O'Brien (Atty. ID # 6216626)
Dennis E. Quaid (Atty. ID #02267012)
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